

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Victoria L. Stonewall	Chapter 13 Proceeding
Debtor(s) PENNYMAC LOAN SERVICES, LLC Movant	24-10475-pmm
vs. Victoria L. Stonewall	Hearing: 07/23/2024
and KENNETH E. WEST Respondents	

OBJECTION TO CONFIRMATION OF THE PLAN

PENNYMAC LOAN SERVICES, LLC (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 plan and states the following:

1. The plan does not provide for the secured creditor, PENNYMAC LOAN SERVICES, LLC to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on February 13, 2024, Movant is the holder of a secured claim in the amount of \$194,937.46 secured by the Debtors' property located at 107 Country Run Drive, Coatesville, PA 19320.
3. On or about March 29, 2024, Movant filed a Proof of Claim listing the arrears to be paid through the plan at **\$39,532.19**. See **Exhibit "A"** attached hereto and made a part hereof.
4. Debtor's Plan proposes to pay Movant **\$30,000.00** in pre-petition arrears, which is insufficient to provide for Movant's arrearage claim. See **Exhibit "B"** attached hereto and made a part hereof.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Karina Velter, Esquire
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Dated: 04/03/2024